

[SUBMITTING COUNSEL SHOWN ON
SIGNATURE PAGES]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO DIVISION

**IN RE KOREAN RAMEN ANTITRUST
LITIGATION**

Case No. 3:13-cv-04115-WHO-DMR

**STIPULATION AND [PROPOSED]
ORDER REGARDING CUSTODIAN
AND SEARCH TERM MEET AND
CONFER**

THIS DOCUMENT RELATES TO:

All Actions

STIPULATION AND [PROPOSED] ORDER -- Case No. 3:13-cv-04115-WHO-DMR

1 WHEREAS, on September 2, 2015 the Parties submitted a stipulation and proposed order
2 regarding the deadline to complete meeting and conferring regarding search terms and custodians to be
3 searched (Doc. No. 201) seeking to move the deadline to file a joint letter with the Court regarding any
4 unresolved issues by September 9, 2015;

5 WHEREAS, on September 2, 2015 the Court approved the parties' stipulation, entering an
6 order setting September 9, 2015 as the date by which the Parties were to submit a joint letter to the
7 Court addressing any unresolved issues regarding search terms and custodians to be searched;

8 WHEREAS, the Parties are continuing to meet and confer regarding the search terms and
9 proposed custodians;

10 WHEREAS, the Parties believe that further meet and confer efforts will be useful in eliminating
11 (or at least narrowing) any disputes on these issues;

12 NOW, THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE
13 UNDERSIGNED COUNSEL, HEREBY STIPULATE TO AN ORDER OF THE COURT AS
14 FOLLOWS:

15 1. The Parties agree to continue to meet and confer regarding search terms and custodians
16 to be searched through September 16, 2015.

17 2. As meet and confer discussions have progressed, the Parties are also cognizant of factors
18 that bear on the meet and confer process. Rather than burdening the Court with a stipulation and
19 a proposed order on a weekly basis, the Parties agree to continue with their good faith efforts to
20 finalize search terms and custodians to be searched and will promptly submit a joint discovery
21 letter in accordance with this Court's Standing Order if an impasse is reached.

22
23 *Signatures of Submitting Parties on the Following Page*

1 Dated: September 9, 2015

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17 Interim Lead Counsel for the Direct Purchaser Plaintiffs

18 Dated: September 9, 2015

IZARD NOBEL LLP

19 By: /s/ Jeffrey S. Nobel

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25 Interim Lead Counsel for the Indirect Purchaser
26 Plaintiffs

27 Dated: September 9, 2015

SQUIRE PATTON BOGGS (US) LLP

28 By: /s/ Anne Choi Goodwin

Anne Choi Goodwin
29 Attorneys for Defendants
30 Nongshim Co. Ltd. and Nongshim America, Inc.

1 Dated: September 9, 2015

GIBSON, DUNN & CRUTCHER LLP

2 By: /s/ Minae Yu

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4 Minae Yu
5 Attorneys for Defendants
6 Ottogi Co. Ltd. and Ottogi America, Inc.
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ORDER

The parties shall file a joint discovery letter by September 30, 2015.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 10, 2015

